

REMARKS

Claims 1-34 are pending. No claim is canceled, withdrawn, amended, or added. No new matter is introduced.

The Office Action mailed September 26, 2003 rejected claim 1 under 35 U.S.C. § 102(e) as anticipated by *Watson* (U.S. Patent No. 5,991,750), claims 6, 11, 16, 21, 26, and 32 under 35 U.S.C. § 103(a) as obvious over *Watson* in view of *Walker et al.* (U.S. Patent No. 6,616,458), claims 2, 7, 12, 17, 22, and 27 under 35 U.S.C. § 103(a) as obvious over *Watson* in view of *Peters et al.* (U.S. Patent No. 5,724,584), claims 3, 4, 8, 9, 13, 14, 18, 19, 23, 24, 28, 29, 30, 33, and 34 under 35 U.S.C. § 103(a) as obvious over *Watson* in view of *Cook* (U.S. Patent No. 6,496,744), and claims 5, 10, 15, 20, 25, and 31 under 35 U.S.C. § 103(a) as obvious over *Watson* in view of *Goldband et al.* (U.S. Patent Application Publication No. US 2001/0018673). Applicant respectfully traverses the rejection of all pending claims, and requests reconsideration of the claims.

Attention is first directed to the rejection of claim 1 as anticipated by *Watson*. Claim 1 recites, “generating a list of customer accounts corresponding to the particular agent from the account information; and displaying the list via a web browser to the agent.”

By contrast, *Watson* (Per Abstract) is directed to an account processing method for providing specific pre-authorization parameters for categories of transactions that would otherwise be completely denied. Upon establishment of an account, certain categories of transactions are specified as needing specific authorization prior to approving the transaction as requested by a merchant. An account issuer provides a service to account members that permits an account manager to independently specify the parametric conditions under which to approve a transaction within such categories.

The cited passage of col. 7, lines 23-30 (Office Action, Page 2, lines 19-20) merely provides a definition of the term “account issuer” as an organization providing administrative services to an account user and a card company or authorizing agent. The account manager may also provide augmented services to an account user or manager such as access to an authorizing agent for account establishment and other functions such as pre-authorization. There is no suggestion or disclosure of “generating a list of customer accounts corresponding to the particular agent from the account information” as recited by claim 1.

In addition, the Office Action cites col. 4, line 67 of *Watson* as disclosing “displaying the list via a web browser to the agent.” (See Office Action, Page 2, line 21) However, this portion of *Watson* discusses an account manager that transfers pre-authorization parameters to a card issuer via the Internet. The general disclosure of the “Internet” is different from the specific feature of “displaying the list via a web browser to the agent” of claim 1.

Further, the lack of disclosure of the claim features is consistent with the acknowledgement by the Office Action that “*Watson* ‘750 fails to disclose generating a list of customer accounts corresponding to the particular agent from the account information, and to instruct display of the list via a web browser to the agent,” with respect to the rejection of claims 6, 11, 16, 21, 26, and 32. (See Office Action, Page 3, lines 17-19)

Attention is now directed to the rejection of claims 6, 11, 16, 21, 26, and 32 as obvious over *Watson* in view of *Walker et al.*, which discloses a method and apparatus for administering a survey, whereby a **controller** such as an online service provider **computer** or an ISP **computer** receives a survey including survey questions from a client desiring to have a survey conducted. (Abstract) The controller creates respondent questions based on the survey questions. The controller also selects one or more respondents from a list of possible respondents, such as a list of customer accounts. The respondent questions are transmitted to the selected respondents.

Responses corresponding to the respondent questions are received. The controller applies an inconsistency test to the responses to generate an inconsistency test result. The inconsistency test determines if the responses originate from computers or humans not paying attention to the questions. Based on the inconsistency test result, a fraud signal may be generated. The fraud signal may result in several actions, such as the controller ignoring the responses received from the corresponding respondent, reducing or eliminating payment to the respondent, transmitting a message of reprimand to the respondent, and/or barring the respondent from future participation in surveys. (Per Abstract, emphasis added) One of ordinary skill in the art of data processing would not be motivated by this disclosure to instruct **display** of the list of customer accounts to the controller (i.e., a **computer**) **via a web browser**, as the controller of *Walker et al.* is a computer which receives a survey and may select respondents from a list of customer accounts for transmittal of respondent questions. *Walker et al.* thus teaches **away** from combining its disclosure with *Watson* for the feature “a processor coupled to the communication interface and configured to generate a list of customer accounts corresponding to the particular agent from the account information, and to instruct **display** of the list **via a web browser to the agent**” as required by claim 6.

For reasons similar to those stated previously with regard to claims 1 and 6, Applicant additionally submits that the rejection of independent claims 11, 16, 21, 26, and 32 should be withdrawn.

With regard to the obviousness rejections of claims 2, 7, 12, 17, 22, and 27, Applicant respectfully submits that the deficiencies of *Watson* are not cured by the secondary reference of *Peters et al.*, particularly with respect to “generating a list of customer accounts corresponding to the particular agent from the account information; and displaying the list via a web browser to the agent.” Applicant respectfully submits that, in its rejection of independent claims 6, 11, 16, 21,

26, and 32, the Office Action specifically states, “Watson ‘750 fails to disclose generating a list of customer accounts corresponding to the particular agent from the account information, and to instruct display of the list via a web browser to the agent.” (Office Action, Page 3, lines 17-19) In its rejection of claims 2, 7, 12, 17, 22, and 27, the Office Action asserts, “Watson ‘750 discloses the elements of claims 1, 6, 11, 16, 21 and 26 as noted above.” There is no mention of how either of *Watson* or *Peters et al.* suggests or discloses the feature which the Office Action previously acknowledged was not disclosed by *Watson*. *Peters et al.* is directed to a method for processing discrete billing events related to batch processing of customer account information in order to perform periodic customer billing. (Abstract and col. 1, lines 22-24) Applicant respectfully submits that neither of the references individually, nor in any reasonable combination, suggests or discloses the missing feature previously discussed with regard to independent claims 1, 6, 11, 16, 21, and 26, from which each of claims 2, 7, 12, 17, 22, and 27, respectively, depend. Thus, Applicant respectfully requests that the rejection of these claims be withdrawn.

Similarly, with regard to the obviousness rejections of claims 3, 4, 8, 9, 13, 14, 18, 19, 23, 24, 28, 29, 30, 33, and 34, Applicant respectfully submits that the addition of *Cook* does not fill in the gaps of *Watson* discussed previously. *Cook* is directed to a system for selling, manufacturing and distributing a custom digital data product from retail stores, over the Internet, over the telephone, or by electronic means (e.g., fax, e-mail, and the like) wherein a customer is provided (e.g., by electronic mail verification) order tracking information. Throughout manufacture and distribution, the customer may track the process by activating a hyperlink in one or more e-mail confirmation messages provided by the service provider, or by entering order/tracking numbers from retail terminals or by telephone, or the like. (Abstract) There is no mention or suggestion in *Cook* of “generating a list of customer accounts corresponding to the

particular agent from the account information; and displaying the list via a web browser to the agent.” As discussed previously, there is no mention or suggestion of this feature in *Watson*. Applicant respectfully submits no reasonable combination of *Watson* and *Cook* suggests or discloses this feature, and thus, the rejection of claims 3, 4, 8, 9, 13, 14, 18, 19, 23, 24, 28, 29, 30, 33, and 34 should be withdrawn.

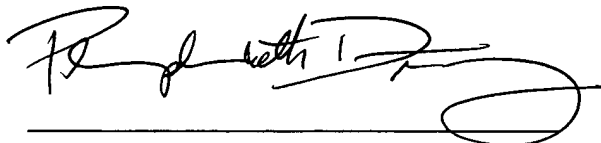
With regard to the obviousness rejections of claims 5, 10, 15, 20, 25, and 31, Applicant respectfully submits that the secondary reference of *Goldband et al.* similarly does not relieve the shortfalls of *Watson*. *Goldband et al.* is directed to broad-based, systematic, individualized, interactive customer software support through a two-way, voluntary automated exchange of information between a **software agent installed on a customer's machine** and a server machine via a wide area computer network, e.g., the Internet. The agent, with the user's informed consent, gathers activity information about the operations of the software program(s) on a single machine and uploads this information to a particular server machine within a distributed server machine architecture, where it is stored in a database on a per-software-copy basis. A rules engine may cause instructions carrying a message targeted specifically toward the customer (based on the activity information) to be downloaded to the agent. Based on these instructions, the agent may take any of various actions, such as present a survey, present an advertisement, send an upgrade notice, present a limited-time offer, deliver individualized marketing messages, offer goods for sale and fulfill the commercial transaction, install an upgrade or bug fix for either an application or the agent itself, etc. Message presentation **to the customer** may be timed (e.g., delayed from the time of download) to achieve maximum impact. For example, a message relating to a particular product feature may be presented just after that feature has been used. (Abstract, emphasis added) There is no mention or suggestion in *Goldband et al.* of “generating a list of customer accounts corresponding to the particular agent from the account information; and

displaying the list via a web browser to the agent.” As discussed previously, there is no mention or suggestion of this feature in *Watson*. Applicant respectfully submits no reasonable combination of *Watson* and *Goldband et al.* suggests or discloses this feature, and thus, the rejection of claims 5, 10, 15, 20, 25, and 31 should be withdrawn.

Therefore, the present application is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at 703-425-6499 so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

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